

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:20-CR-517-BO(3)

UNITED STATES OF AMERICA)

v.)

JAMEEL EL-AMIN WILLIAMS)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on a date unknown to the Grand Jury, but no later than in or about 2012, and continuing up to and including on or about July 17, 2020, in the Eastern District of North Carolina, and elsewhere, the defendant, JAMEEL EL-AMIN WILLIAMS, did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute five hundred (500) grams or more of cocaine, a Schedule II controlled substance, and one (1) kilogram or more of heroin, and a quantity of marijuana, Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1)

All in violation of Title 21, United States Code, Section 846.

ALLEGATION OF PRIOR CONVICTION

Before the defendant, JAMEEL EL-AMIN WILLIAMS, committed the offense charged in this count, he had a final conviction for a serious violent felony, namely a

conviction under North Carolina General Statute § 14-17 for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of commencement of the instant offense.

COUNT TWO

On or about June 24, 2020, in the Eastern District of North Carolina, the defendant, JAMEEL EL-AMIN WILLIAMS, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about June 25, 2020, in the Eastern District of North Carolina, the defendant, JAMEEL EL-AMIN WILLIAMS, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about July 17, 2020, in the Eastern District of North Carolina, the defendant, JAMEEL EL-AMIN WILLIAMS, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of heroin, a Schedule I controlled substance, five hundred (500) grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

ALLEGATION OF PRIOR CONVICTION

Before the defendant, JAMEEL EL-AMIN WILLIAMS, committed the offense charged in this count, he had a final conviction for a serious violent felony, namely a conviction under North Carolina General Statute § 14-17 for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of commencement of the instant offense.

COUNT FIVE

On or about July 17, 2020, in the Eastern District of North Carolina, JAMEEL EL-AMIN WILLIAMS, did knowingly and intentionally maintain a place at 2576 Bent Green Road, Raleigh, North Carolina, for the purpose of manufacturing, distributing, and using heroin, a Schedule I controlled substance, and cocaine and cocaine base (crack), Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT SIX

On or about July 17, 2020, in the Eastern District of North Carolina, the defendant, JAMEEL EL-AMIN WILLIAMS, did knowingly possess a firearm, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States as charged in Counts Four and Five of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN

On or about July 17, 2020, in the Eastern District of North Carolina, the defendant, JAMEEL EL-AMIN WILLIAMS, knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

(Remainder of page intentionally left blank)

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Personal Property:

- a) Approximately \$18,363 in United States Currency seized on July 17, 2020 from JAMEEL EL-AMIN WILLIAMS,
- b) Draco 7.62 semi-automatic rifle with Serial Number DB-9865-19 seized on

July 17, 2020 from JAMEEL EL-AMIN WILLIAMS,

- c) Glock :357 Model 32 pistol with Serial Number FWK165 seized on July 17, 2020 from JAMEEL EL-AMIN WILLIAMS,
- d) Springfield XDM 9mm pistol with Serial Number 495075 seized on July 17, 2020 from JAMEEL EL-AMIN WILLIAMS,
- e) Any and all associated ammunition seized on July 17, 2020 from JAMEEL EL-AMIN WILLIAMS.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

REDACTED VERSION

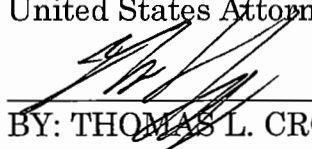
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

~~FOR~~ PERSON

DATE:

11/18/2020

ROBERT J. HIGDON, Jr.
United States Attorney


BY: THOMAS L. CROSBY
Assistant United States Attorney
Criminal Division